

COPY

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 221 North Figueroa Street, Suite 1200
 Los Angeles, California 90012
 Telephone: 213.250.1800
 Facsimile: 213.250.7900

6 Attorneys for Defendant AFNI, INC.

7 UNITED STATES DISTRICT COURT
 8 CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION
 9

10 CHERLYNN KEITHLEY,

11 Plaintiff,

12 vs.

13 AFNI, INC.

14 Defendant.
 15

EDCV12-1358 VAP(10px)
 CASE NO.

NOTICE OF REMOVAL

Trial Date: None Set

16 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

17 PLEASE TAKE NOTICE that Defendant AFNI, INC. ("AFNI") hereby
 18 removes to this Court the state court action described below:

19 1. On June 28, 2012, an action was commenced in the Superior Court of
 20 California, County of San Bernardino, entitled *Cherlynn Keithley v. Afni, Inc.*,
 21 County of San Bernardino Superior Court Case No. CIVVS 1203078. A true and
 22 correct copy of Plaintiff's Complaint in the *Cherlynn Keithley v. Afni, Inc.* action is
 23 attached hereto as Exhibit "A."

24 2. AFNI was served with said Complaint on July 17, 2012. Attached
 25 hereto as Exhibit "B" is a true and correct copy of CT Corporation's Service of
 26 Process Transmittal reflecting a service date of July 17, 2012.

27 3. This action is a civil action of which this Court has original jurisdiction
 28 under 28 U.S.C. § 1331, and is one which may be removed to this Court by AFNI

1 pursuant to the provisions of 28 U.S.C. § 1441(b) in that it arises under the Fair
2 Debt Collection Practices Act ("FDCPA") 15 U.S.C. § 1692, et seq.

3 4. There are no other defendants named in the Complaint.
4

5 DATED: August 15, 2012

STEPHEN H. TURNER
PATRIK JOHANSSON
LEWIS BRISBOIS BISGAARD & SMITH LLP

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7
8
9 By: 

10 Patrik Johansson
11 Attorneys for Defendant AFNI, INC.
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EXHIBIT “A”

1 Todd M. Friedman (216752)
2 Nicholas J. Bontrager (252114)
3 Suren N. Weerasuriya (278521)
4 Law Offices of Todd M. Friedman, P.C.
5 369 S. Doheny Dr. #415
6 Beverly Hills, CA 90211
7 Phone: 877-206-4741
8 Fax: 866-633-0228
9 Attorneys for Plaintiff

COPY
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
VICTORVILLE DISTRICT
JUN 28 2012
BY V. Diederich
VANESKA DIEDERICH, DEPUTY

10
11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SAN BERNARDINO**
14 **LIMITED JURISDICTION**

15 Case No. CIVVS 1203078

16 **CHERLYNN KEITHLEY,**

17 Plaintiff,

18 vs.

19 **AFNI, INC.,**

20 Defendant.

) **COMPLAINT FOR VIOLATION**
) **OF ROSENTHAL FAIR DEBT**
) **COLLECTION PRACTICES ACT AND**
) **FEDERAL FAIR DEBT COLLECTION**
) **PRACTICES ACT**

) **(Amount not to exceed \$10,000)**

-) 1. Violation of Rosenthal Fair Debt
) Collection Practices Act
) 2. Violation of Fair Debt Collection
) Practices Act

21 **I. INTRODUCTION**

22 1. This is an action for damages brought by an individual consumer for Defendant's
23 violations of the Rosenthal Fair Debt Collection Practices Act, Cal Civ Code §1788, *et seq.*
24 (hereinafter "RFDCPA") and the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.*
25 (hereinafter "FDCPA"), both of which prohibit debt collectors from engaging in abusive,
26 deceptive, and unfair practices.
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II. PARTIES

2. Plaintiff, Cherlynn Keithley ("Plaintiff"), is a natural person residing in San Bernardino county in the state of California, and is a "consumer" as defined by the FDCPA, 15 U.S.C. §1692a(3) and is a "debtor" as defined by Cal Civ Code §1788.2(h).

3. At all relevant times herein, Defendant, AFNI, Inc. ("Defendant") was a company engaged, by use of the mails and telephone, in the business of collecting a debt from Plaintiff which qualifies as a "debt," as defined by 15 U.S.C. §1692a(5), and a "consumer debt," as defined by Cal Civ Code §1788.2(f). Defendant regularly attempts to collect debts alleged to be due another, and therefore is a "debt collector" as defined by the FDCPA, 15 U.S.C. §1692a(6), and RFDCPA, Cal Civ Code §1788.2(c).

III. FACTUAL ALLEGATIONS

4. At various and multiple times prior to the filing of the instant complaint, including within the one year preceding the filing of this complaint, Defendant contacted Plaintiff in an attempt to collect an alleged outstanding debt.

5. Defendant sent a letter to Plaintiff dated January 19, 2012, regarding an alleged debt for a Verizon account. However, that account had been settled by Plaintiff in March, 2010.

6. On January 25, 2012, upon receipt of Defendant's letter, Plaintiff called Defendant to advise that the account had been paid off. However, Defendant told Plaintiff that Verizon had sent the account to collections in November, 2011.

7. On February 14, 2012, Plaintiff's counsel sent a letter to Defendant to dispute the debt. On March 6, 2012, Defendant responded to state that the account was still owed in the amount of \$285.59, despite Plaintiff's dispute.

8. Defendant's conduct violated the FDCPA and the RFDCPA in multiple ways, including but not limited to:

- a) Communicating or threatening to communicate credit information which is known or which should be known to be false (§1692e(8));
- b) Threatening to take an action against Plaintiff that cannot be legally taken or that was not actually intended to be taken (§1692e(5));
- c) Using false representations and deceptive practices in connection with collection of an alleged debt from Plaintiff (§1692e(10));
- d) Falsely representing the character, amount, or legal status of Plaintiff's debt (§1692c(2)(A));
- e) Using unfair or unconscionable means against Plaintiff in connection with an attempt to collect a debt (§1692f);
- f) Collecting an amount from Plaintiff that is not expressly authorized by the agreement creating the debt (§1692f(1)); and
- g) Collecting an amount from Plaintiff that is not permitted by law (§1692f(1)).

9. As a result of the above violations of the FDCPA and RFDCPA, Plaintiff suffered and continues to suffer injury to Plaintiff's feelings, personal humiliation, embarrassment, mental anguish and emotional distress, and Defendant is liable to Plaintiff for Plaintiff's actual damages, statutory damages, and costs and attorney's fees.

**COUNT I: VIOLATION OF ROSENTHAL
FAIR DEBT COLLECTION PRACTICES ACT**

10. Plaintiff reincorporates by reference all of the preceding paragraphs.

11. To the extent that Defendant's actions, counted above, violated the RFDCPA, those actions were done knowingly and willfully.

1.
2. **PRAYER FOR RELIEF**

3. WHEREFORE, Plaintiff respectfully prays that judgment be entered against Defendant
4. for the following:
5.

6. A. Actual damages;
7. B. Statutory damages for willful and negligent violations;
8. C. Costs and reasonable attorney's fees; and
9. D. For such other and further relief as may be just and proper.

10. **COUNT II: VIOLATION OF FAIR DEBT**
11. **COLLECTION PRACTICES ACT**

12. 12. Plaintiff reincorporates by reference all of the preceding paragraphs.

13. **PRAYER FOR RELIEF**

14. WHEREFORE, Plaintiff respectfully prays that judgment be entered against Defendant
15. for the following:

16. A. Actual damages;
17. B. Statutory damages;
18. C. Costs and reasonable attorney's fees; and,
19. D. For such other and further relief as may be just and proper.

20. **PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**

21. Respectfully submitted this 25th day of June, 2012.

22. By: 

23. Todd M. Friedman, Esq.
24. Law Offices of Todd M. Friedman, P.C.
25. Attorney for Plaintiff
26.
27.
28.

7/17/12
2:52PM
AP

SUM-100

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

AFNI, INC.

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

CHERLYNN KEITHLEY

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
VICTORVILLE DISTRICT

JUN 28 2012

BY V. Diederich
VANESKA DIEDERICH, DEPUTY

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Superior Court of San Bernardino
14455 Civic Drive, Suite 100
Victorville, CA 92392

CASE NUMBER:
(Número del Caso): **CIVVS 1203078**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Todd M. Friedman, 369 S. Doheny Dr., #415, Beverly Hills, CA 90211, 877-206-4741

DATE: JUN 28 2012 Clerk, by VANESKA DIEDERICH Deputy
(Fecha) (Secretaria) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010))

(SEAL)

COPY

NOTICE TO THE PERSON SERVED: You are served

1. ☒ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

AFNI, Inc

3. ☒ on behalf of (specify):

- under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☒ by personal delivery on (date): 7/17/12

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY Name, State Bar number, and address: Todd M. Friedman, Esq. SBN 216752 Law Offices of Todd M. Friedman 369 S. Doheny Dr. #415 Beverly Hills, CA 90211 TELEPHONE NO.: 877-206-4741 FAX NO.: 866-633-0228		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDINO VICTORVILLE DISTRICT JUN 28 2012 BY <u>V. Diederich</u> VANESKA DIEDERICH, DEPUTY
ATTORNEY FOR (Name): Plaintiff, Cherylann Keithley		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Bernardino STREET ADDRESS: 14455 Civic Drive, Suite 100 MAILING ADDRESS: CITY AND ZIP CODE: Victorville, CA 92392 BRANCH NAME: Victorville Courthouse		
CASE NAME: Cherylann Keithley v. AFNI, Inc.		
CIVIL CASE COVER SHEET <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		CASE NUMBER: CIVVS 1203078
Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other P/IPD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/IPD/W/D (23) Non-P/IPD/W/D (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-P/IPD/W/D tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (28) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary, declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): 2

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 25, 2012
 Todd M. Friedman

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

CIVIL CASE COVER SHEET

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO

Cherlynn Keithley

Case No. CIVVS 1203078

vs.

CERTIFICATE OF ASSIGNMENT

AFNI, Inc.

A civil action or proceeding presented for filing must be accompanied by this certificate. If the ground is the residence of a party, name and residence shall be stated.

The undersigned declares that the above-entitled matter is filed for proceedings in the Viccorville District of the Superior Court under Rule 404 of this court for the checked reason:

☐ General☐ Collection

Nature of Action	Ground
<input type="checkbox"/> 1 Adoption	Petitioner resides within the district.
<input type="checkbox"/> 2 Conservator	Petitioner or conservatee resides within the district.
<input type="checkbox"/> 3 Contract	Performance in the district is expressly provided for.
<input type="checkbox"/> 4 Equity	The cause of action arose within the district.
<input type="checkbox"/> 5 Eminent Domain	The property is located within the district.
<input type="checkbox"/> 6 Family Law	Plaintiff, defendant, petitioner or respondent resides within the district.
<input type="checkbox"/> 7 Guardianship	Petitioner or ward resides within the district or has property within the district.
<input type="checkbox"/> 8 Harassment	Plaintiff, defendant, petitioner or respondent resides within the district.
<input type="checkbox"/> 9 Mandate	The defendant functions wholly within the district.
<input type="checkbox"/> 10 Name Change	The petitioner resides within the district.
<input type="checkbox"/> 11 Personal Injury	The injury occurred within the district.
<input type="checkbox"/> 12 Personal Property	The property is located within the district.
<input type="checkbox"/> 13 Probate	Decedent resided or resides within the district or had property within the district.
<input type="checkbox"/> 14 Prohibition	The defendant functions wholly within the district.
<input type="checkbox"/> 15 Review	The defendant functions wholly within the district.
<input type="checkbox"/> 16 Title to Real Property	The property is located within the district.
<input type="checkbox"/> 17 Transferred Action	The lower court is located within the district.
<input type="checkbox"/> 18 Unlawful Detainer	The property is located within the district.
<input type="checkbox"/> 19 Domestic Violence	The petitioner, defendant, plaintiff or respondent resides within the district.
<input checked="" type="checkbox"/> 20 Other RFDCPA	Plaintiff resides within the district
<input type="checkbox"/> 21 THIS FILING WOULD NORMALLY FALL WITHIN JURISDICTION OF SUPERIOR COURT.	

The address of the accident, performance, party, detention, place of business, or other factor which qualifies this case for filing in the above-designated district is:

Cherlynn Keithley

10670 Christenson Road

(NAME - INDICATE TITLE OR OTHER QUALIFYING FACTOR)

ADDRESS

Lucerne Valley

CA

92356

(CITY)

(STATE)

(ZIP CODE)

I declare, under penalty of perjury, that the foregoing is true and correct and that this declaration was executed on

June 25, 2012

at

Beverly Hills

, California

Signature of Attorney/Party

Superior Court of California - County of San Bernardino

WWW.SB-COURT.ORG

=====

CASE NUMBER: CIVVS1203078

NOTICE OF ASSIGNMENT FOR ALL PURPOSES

Please take notice that this case has been assigned for hearing to the San Bernardino Superior Court, Civil division located at 303 W. 3rd st San Bernardino , Ca. 92415.

All documents shall be filed at the Victorville Superior Court located at 14455 Civic Drive, Ste., 100 Victorville Ca. 92392.

With the following Exception:
Documents that are filed less than 10 days prior to the hearing shall be filed in the San Bernardino Superior Court Civil Division located at 303 West 3rd., Street, San Bernardino Ca., 92415.

Date: 07/09/12

Stephen H. Nash, Clerk of the Court

By: VANESKA DIEDERICH

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
SUPERIOR COURT

SAN BERNARDINO CIVIL DIVISION
303 WEST THIRD STREET
SAN BERNARDINO, CA 92415-0210

VICTORVILLE DISTRICT
14455 Civic Drive Ste 100
Victorville, CA 92392

CASE NO: CIVVS1203078

http://www.sb-court.org
IN RE: KEITHLEY VS AFNI

NOTICE OF CASE ASSIGNMENT FOR ALL PURPOSES
NOTICE OF OSC:SERVICE OF SUMMONS AND COMPLAINT
NOTICE OF CASE MANAGEMENT CONFERENCE

TO THE PARTY SERVED: The dates below DO NOT increase the time you have to respond to the Complaint filed against you as the time for your response is stated on the "SUMMONS".

PLAINTIFF: PLEASE TAKE NOTICE, that the above entitled case has been set for an Order to Show Cause why the case should not be dismissed for failure to serve the Summons and Complaint and a Case Management Conference. File your Case Management Statement with the court 15 calendar days prior to the hearing. Failure to appear may result in monetary sanctions and/or dismissal of your case.

This Case is assigned to Department S33 for all purposes.
The OSC:SERVICE OF SUMMONS AND COMPLAINT is set for 11/01/12 at 8:30 in Department S33
If "Proof of Service" of the Summons and Complaint has been filed 10 court days prior to the hearing, no appearance is required and the hearing date will be vacated.

The Case Management Conference is set for 01/17/13 at 8:30 in Department S33.

Stephen H. Nash, Clerk of the Court

Date: 07/09/12

By: VANESKA DIEDERICH

CERTIFICATE OF SERVICE

I am a Deputy Clerk of the Superior Court for the County of San Bernardino at the above listed address. I am not a party to this action and on the date and place shown below, I served a copy of the above listed notice by:

☒ Enclosed in an envelope mailed to the interested party addressed above, for collection and mailing this date, following ordinary business practice.

☐ Enclosed in a sealed envelope, first class postage prepaid in the U.S. mail at the location shown above, mailed to the interested party and addressed as shown above, or as shown on the attached listing.

☐ A copy of this notice was given to the filing party at the counter.

☐ A copy of this notice was placed in the bin located at this office and identified as the location for the above law firm's collection of file stamped documents.

DATE OF MAILING: 07/09/12

I declare under penalty of perjury that the foregoing is true and correct. Executed on 07/09/12 at Victorville, CA By: VANESKA DIEDERICH
notice: NCMCT1 action: cmc



**Service of Process
Transmittal**

07/17/2012

CT Log Number 520877551

TO: Alicia Williams
Afni, Inc.
1310 Martin Luther King Dr.
Bloomington, IL 61701

RE: Process Served in California

FOR: Afni, Inc. (Domestic State: IL)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Cherlynn Keithley, Plff. vs. AFNI, Inc., Dft.
DOCUMENT(S) SERVED:	Summons, Cover Sheet, Complaint, Certificate, Notice(s)
COURT/AGENCY:	San Bernardino County - Superior Court - Victorville, CA Case # CIVVS1203078
NATURE OF ACTION:	Violation of Rosenthal Fair Debt Collection Practices Act
ON WHOM PROCESS WAS SERVED:	CT Corporation System, Los Angeles, CA
DATE AND HOUR OF SERVICE:	By Process Server on 07/17/2012 at 16:16
JURISDICTION SERVED:	California
APPEARANCE OR ANSWER DUE:	Within 30 days
ATTORNEY(S) / SENDER(S):	Todd M. Friedman Law Offices of Todd M. Friedman 369 S. Doheny Dr., #415 Beverly Hills, CA 90211 877-206-4741
ACTION ITEMS:	CT has retained the current log, Retain Date: 07/17/2012, Expected Purge Date: 07/22/2012 Image SOP Email Notification, Alicia Williams alicia.williams@afni.com Email Notification, Debra Ciskey debraciskey@afni.com
SIGNED:	CT Corporation System
PER:	Nancy Flores
ADDRESS:	818 West Seventh Street Los Angeles, CA 90017
TELEPHONE:	213-337-4615

Page 1 of 1 / KL

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

FEDERAL COURT PROOF OF SERVICE

CHERLYNN KEITHLEY V. AFNI, INC

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 221 North Figueroa Street, Suite 1200, Los Angeles, CA 90012. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On August 15, 2012, I served the following document(s): NOTICE OF REMOVAL

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Todd M. Friedman, Esq.
369 South Doheny Dr., Suite 415
Beverly Hills, Ca 90211
877-206-4741

The documents were served by the following means:

☒ (BY U.S. MAIL) I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed above and I deposited the sealed envelope or package with the U.S. Postal Service, with the postage fully prepaid.

I declare under penalty of perjury under the laws of the State of CALIFORNIA that the foregoing is true and correct.

Executed on August 15, 2012, at Los Angeles, California.


Rosa Roias